

Modern Slavery Statement 2024

Slavery, servitude, forced labor, and human trafficking remain global concerns, and no industry or company can be considered immune to the different forms of modern slavery. Nokia does not tolerate, in any form or context, the use of servitude, forced or bonded labor, human trafficking, or other forms of modern slavery in both its own operations and any part of its global supply chain.

Contents

1 Mapping our business and supply chain	2
1.1 Nokia business profile	2
1.2 Nokia supply chain profile.....	2
2 Our Code of Conduct and related standards	4
2.1 Purchasing practices.....	5
2.2 Zero tolerance for child and forced labor.....	6
2.3 Freedom of association and collective bargaining.....	6
2.4 Human Rights Policy	6
3 Due diligence and training.....	7
3.1 Driving improvement through training and capability building.....	8
3.2 In-depth training and guidance for on-site personnel.....	9
3.3 The risk of mistreatment of minorities and modern slavery.....	9
3.4 Finding a solution to conflict minerals.....	10
3.5 Enhancement of procurement processes	11
4 Reporting concerns and speak-up culture.....	11
5 Audit results 2024	12
5.1 Increasing supply chain transparency.....	12
6 Collaboration and looking forward.....	13
7 Attestation and other legal mentions.....	15

1 Mapping our business and supply chain

1.1 Nokia business profile

At Nokia¹ we create technology that helps the world act together. We put the world's people, machines and devices in sync to create a more sustainable, productive and accessible future. As a B2B technology innovation leader, we are driving the next evolution of networking to enable people, machines and devices to interact in real time. We are pioneering networks that sense, think and act by leveraging our work across mobile, fixed and cloud networks. In addition, we create value with intellectual property and long-term research, led by the award-winning Nokia Bell Labs. We have built industry-leading patents, and technology programs.

Customers and business partners worldwide trust Nokia to deliver secure, reliable, and sustainable networks today – and work with us to create the digital services and applications of the future.

Connectivity plays an increasingly important role in the economy and in society. As a result, we serve a growing number of customers who provide critical services to end-users. We distinguish two primary customer segments that we serve with our hardware, software and services portfolio: communications services providers and enterprises, therein enterprise verticals and webscalers. In addition, we license our intellectual property to industries that benefit from our fundamental innovations, primarily in mobile devices, automotive, consumer electronics and IoT industries. We have four core business groups: Network Infrastructure, Mobile Networks, Cloud and Network Services, and Nokia Technologies. For more information, please refer to our 2024 Annual Report.

Nokia employees work in R&D, in the production, deployment and maintenance of network hardware and infrastructure, or in corporate roles, including sales, legal, finance or other business support functions.

This statement focuses on our supply chain where we see the greatest potential risk of forced or bonded labor, or other forms of modern slavery. We consider the risk of encountering modern slavery in Nokia's own operations as highly unlikely.

1.2 Nokia supply chain profile

Identifying the part of our supply chain most at risk

Nokia drives active engagement across its value chain, working with its suppliers to raise the standards in its ecosystem in key Environmental, Social and Governance (ESG) areas

¹ For the purposes of this statement, Nokia refers to Nokia Corporation, a company incorporated under the laws of the Republic of Finland, with its seat at Karakaari 7 FI-02610 Espoo, Finland, and to its subsidiaries, including, for purposes of various jurisdictions, the legal entities mentioned on the last page of this statement, under the headline "Attestation and other legal mentions"

including labor rights and Health and Safety. Supplier due diligence is one of the four pillars of Nokia's responsible sourcing strategy complemented by supplier development and learning and industry collaboration as key enablers for success.

In 2024, Nokia conducted business with around 9 300 suppliers in over 100 countries, and 80% of Nokia's total supplier spend was distributed across around 400 suppliers. Nokia's suppliers fall into six broad categories:

- Final assembly suppliers
- Hardware suppliers for product materials (such as standard components, optical components, semiconductors, electromechanics and RF Accessories)
- Market services suppliers who support the provision of services to our customers such as in installation, construction and managed services
- Software
- Cloud Services
- Indirect sourcing suppliers for everyday goods and services needed to run Nokia's business such as consulting, legal and marketing.

We continue to work with Verisk Maplecroft, a global risk analytics company, for an independent view of the potential risks of modern slavery globally. A list of Nokia's largest strategic original design manufacturers, original equipment manufacturers and component suppliers² is published on our website to further increase stakeholder transparency. The listed suppliers accounted for approximately 50% of our spend in 2024 for the manufacturing and/or production of our products and components.

Risk assessment of our supplier profiles:

Products/services category	Explanation	Modern slavery risk (based on workforce skill level, risk of informal employment, etc.)
Market support services	Includes site installation and construction, managed services, technical support services, and external workforce services.	High
Indirect sourcing	Includes tax, consulting, financial, legal, marketing, business process outsourcing (BPO), business services, training, HR operations and benefits, health and safety, travel and fleet, and events services.	Low
Electromechanics & RF accessories	Includes cable and connector assembly, printed circuit boards (PCBs), power systems, RF filters, metals, and subracks.	High
Manufacturing & delivery	Includes final assembly, original design manufacturer (ODM), repair and spares, logistics, warehousing, test	Medium

² Nokia Supplier List

<https://www.nokia.com/sites/default/files/2025-03/nokia-supplier-list-2025.pdf>

	equipment, and IT hardware. Includes vertical market solutions and incubation, original equipment manufacturer (OEM) software solutions, and platforms.	
Optical components	Includes optical active discretes, optical passives, and optical transceivers.	Medium
Semiconductors	Includes semiconductors.	Low
Standard components	Includes analog and standard components, RF and timing, and computational components.	Medium
IT hardware, software, & services	Includes IT hardware, IT infrastructure and security, enterprise applications, software, and Software-as-a-Service (SaaS), and IT consulting and telecom services: mobile voice, fixed voice, wide area networks (WAN), and data.	Low

Nokia collaborates closely with customers and suppliers to engage on systemic issues related to the environment, mitigating the misuse of technology (and advocating for responsible AI principles), ethics, human rights, and working conditions. This includes addressing topics such as the responsible sourcing of minerals, climate, circularity and labor rights in the lower tiers of its value chain as well as understanding the sustainability expectations of stakeholders and working towards accommodating them, complemented by supplier development, learning, and industry collaboration.

We have conducted an analysis of the impacts and risks related to the working conditions and other work-related rights for workers in lower tiers of Nokia's value chain. Results of this analysis are covered on page 155 of our 2024 Annual Report³.

2 Our Code of Conduct and related standards

We are committed to upholding the laws and regulations in all countries where we operate. Our Code of Conduct⁴ outlines standards for ethical behavior by Nokia employees and business partners. The Code of Conduct includes our basic principles of business conduct and high-level policy statements related to critical business topics. Policy documents further define, support, and explain specific policies. Standard Operating Procedures are created, where needed, to instruct employees on specific procedures to implement the policies. We support, maintain, and constantly improve our employees' knowledge of compliance with the Code of Conduct through mandatory training, and we communicate regularly on its importance.

Our Code of Conduct, our People Framework, our Human Rights Policy, and local employment laws, policies and practices are the basis for our labor conditions.

³ Nokia Annual Report https://www.nokia.com/system/files/2025-04/nokia-annual-report-2024_1.pdf

⁴ Code of Conduct <https://www.nokia.com/about-us/code-of-conduct/>

We are aligned with key elements of the social accountability standard SA8000. Our policies⁵, standard operating procedures (SOPs), and the Code of Conduct are applicable to our employees as well as our suppliers. Nokia expects its suppliers to adhere to the Nokia Third-Party Code of Conduct and provides them with Nokia Supplier Requirements, including the Responsible Business Alliance's (RBA)⁶ Code of Conduct and additional Nokia-specific sustainability requirements.

Our policies and SOPs cover:

- Zero tolerance for child and forced labor
- Responsible recruitment and exit
- Freedom of association and collective bargaining
- Worker-management communication
- Non-discrimination
- Humane treatment
- Working time
- Disciplinary practices
- Compensation and remediation
- Occupational health and safety

We offer multiple channels to report ethical concerns, including a dedicated email address, an online portal, and country-specific phone numbers. Our Nokia Ethics Helpline allows for anonymous reporting and is open to employees and external stakeholders. We respond to - and investigate - all concerns promptly, and establish remediation plans as needed.

2.1 Purchasing practices

Nokia's internal analysis and enterprise risk management process help identify potential supply chain risks. Nokia carries out more in-depth analyses to determine key supply chain risks via its dedicated internal Supplier Sustainability Risk Dashboard, where it looks at various sustainability risks, commodity risks and more, on a supplier location level. The outcomes are included in our purchasing category strategies related to type and size of supplier, in addition to our monitoring- and performance- related requirements. We review category strategies annually with our purchasing category leads, as well as supplier location and business context. This approach helps ensure responsible purchasing practices across the company.

We conduct regular assessments with our suppliers to help them understand and meet our ethical, labor and human rights standards and identify areas of improvement, as needed. Our general audit covers the full set of supplier requirements, including corporate responsibility requirements, and is often used with new suppliers located in high-risk countries or suppliers where there has been significant change in business scope or location.

⁵ Policies <https://www.nokia.com/we-are-nokia/leadership-and-governance/policies/>

⁶ Responsible Business Alliance Code of Conduct <https://www.responsiblebusiness.org/code-of-conduct/>

2.2 Zero tolerance for child and forced labor

We have zero tolerance for, and strictly forbid, any form of child labor and all forms of forced, bonded, or imprisoned labor in both our own operations and our supply chain.

2.3 Freedom of association and collective bargaining

We respect the right to collective bargaining and freedom of association. Collective bargaining agreements are local and, in most countries where we have collective bargaining agreements, employees who have chosen not to be members of a union are also covered by similar terms. Employees can choose freely to join, not join, or leave unions and associations and select their representatives based on local and international practices.

We encourage active, open communication and dialog with employees and/or their representatives.

2.4 Human Rights Policy

Nokia believes that connectivity and the technologies we provide are a social good that can support human rights by enabling free expression, access to information, exchange of ideas, and economic development.

Our Human Rights Policy⁷ addresses our most salient risks related to the potential misuse of the technology we provide. Policies related to other human rights risks – for example those related to fair labor practices, modern slavery and human trafficking, and environmental stewardship – are reflected in other Nokia policies, which can be found on our website.

Nokia is committed to the human rights principles and values laid out in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and its related covenants), the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the OECD's Guidelines for Multinational Enterprises, and the United Nations' Guiding Principles on Business and Human Rights.

Nokia's Human Rights Due Diligence (HRDD) process targets the potential misuse of the technology it provides. It is a pre-emptive process applied before any sale is made and is used to identify the most likely risk level to human rights through the potential misuse of our technology.

As stated earlier, we have zero tolerance and strictly forbid any form of child labor and all forms of forced, bonded or imprisoned labor in both our own operations and our supply chain. Where such a potential risk is identified, it is thoroughly investigated, and a remediation plan is put in place based on the Social Accountability SA8000 recommendations.

⁷ Nokia Human Rights Policy

https://www.nokia.com/sites/default/files/2023-03/nokia_human_rights_policy_2023-1.pdf

In our recruitment, retention, promotion, and other employment activities, we are committed to complying with the applicable employment and labor laws and regulations wherever we do business, including wages and hours, privacy, immigration, compulsory and child labor, collective bargaining, anti-discrimination, working time and similar employment rules.

3 Due diligence and training

We require our suppliers to uphold Nokia's policies and share the overall values expressed in our Third-Party Code of Conduct without any obstruction or discouragement. To demonstrate their commitment to respecting human rights and ethical business conduct, we expect our suppliers to have relevant management systems and resources in place, as well as a company code of conduct. We conduct regular, robust assessments with our supplier network to support them in meeting our ethical, labor and human rights standards and improving performance where necessary.

Nokia labor-related requirements to our suppliers are based on international standards such as the Universal Declaration of Human Rights, the International Labor Organization Core Conventions and the Social Accountability SA8000 Standard. These requirements include working time, overtime, leave, compensation and benefits as well as modern slavery risk and forced labor prevention and are covered under Nokia's Supplier Requirements, which include the requirements from the latest version of the RBA Code of Conduct as well as Nokia-specific supplier requirements in addition to the RBA industry Code. An overview of Nokia's Supplier Requirements is published on Nokia's website and made available to all stakeholders.

These Supplier Requirements are cascaded down to suppliers as part of qualification and contracting, as well as supplier training, and are expected to be cascaded down to the next tier of suppliers by Nokia's suppliers.

Our supplier requirements are also regularly reviewed based on evolving industry standards such as the Social Accountability SA8000 Standard, or in relation to the codes of organizations such as the RBA⁸ and the Joint Alliance for Corporate Social Responsibility (JAC)⁹.

Nokia actively engages with its suppliers to promote responsible sourcing practices in key sustainability areas, including environmental issues, health and safety, labor rights, ethical behavior and conflict-free sourcing. The company's responsible sourcing program focuses on supplier due diligence, climate action, circularity, and responsible minerals sourcing. Nokia collaborates with the RBA and JAC, comprising some of the world's largest telecom operators to assess and further develop these programs. In 2024, the Nokia Supply Chain Sustainability team spoke at several RBA Outreach meetings in India and Brussels,

⁸ The Responsible Business Alliance (RBA) <https://www.responsiblebusiness.org/>

⁹ Joint Alliance for Corporate Social Responsibility (JAC) <https://jointallianceforcsr.org/>

Belgium, as well as at the 13th Forum on Business and Human Rights in Geneva, Switzerland. These outreach meetings were also promoted among our suppliers.

Nokia's supplier-related monitoring, assessment and auditing activities also include EcoVadis assessments. These are online assessments include evaluations of a supplier's policies and controls relating to working time and leave, remuneration, recruitment and forced labor prevention. Responses are scored by an independent analyst, and based on the findings, corrective actions are identified and followed up with suppliers.

We conduct in-depth corporate responsibility audits covering labor conditions and environmental management for our existing suppliers. Implementation of these audits is aligned with the SA8000 methodology, and covers document reviews, interviews with managers and employees, and site visits, as well as inspections of facilities, production lines, and warehouses. Our audits include tier 1 and tier 2 suppliers, and we expect and require our suppliers to audit their next-tier suppliers.

Nokia corporate responsibility auditors are trained through a Social Accountability International (SAI) auditor training on the SA8000 standard which provides guidance on how to recognize issues. Experienced auditors further train new auditors and share knowledge and experience across the teams.

In 2024, we conducted a total of 606 supplier audits and EcoVadis assessments, of which 101 were in-depth corporate responsibility audits and 469 were online assessments with EcoVadis on labor, safety, and environmental elements. These audits covered 16 countries including China, India, Japan, Malaysia, Mexico, Singapore, Taiwan, Thailand, the Philippines, and Vietnam.

We report publicly on the types and numbers of audit findings as well as corrective actions taken. Our performance, which we report annually against set KPIs, is available in our 2024 Annual Report.

We also continued the monthly monitoring of working hours, days off, and contractual labor usage on a factory level for our key final assembly suppliers.

Table on following page

KPI	Nokia Annual Report – page number
Corporate sustainability audits and assessments in 2024	p.157
Examples of audit findings and corrective actions taken	p.157

3.1 Driving improvement through training and capability building

Engagement and interactions with supplier employees are also conducted via supplier training (on-site workshops and webinars). By improving our competencies and transparency around labor conditions and workers' rights, health and safety,

environmental impact, and conflict-free sourcing, we can better address the risks and facilitate the competent development of our suppliers.

In 2024, we continued to develop supplier capabilities around issues found in audits through supplier webinars. In total, we ran eleven supplier training webinars on subjects such as modern slavery, labor migration and ethical recruitment, responsible minerals sourcing, climate change, circular practices and health and safety. We also conducted an online webinar on “Child rights in global supply chains” with UNICEF Finland for our suppliers. Our suppliers also benefit from industry-wide training programs and training materials that are made available through the EcoVadis Academy, Responsible Business Alliance Academy and CDP.

Nokia’s corporate culture of integrity is supported by its comprehensive compliance training program, including its mandatory “Ethical Business Training” course which is required annually for all employees. It includes a review and acknowledgment of Nokia’s Code of Conduct and the related 14 policy areas. In 2024, 98% (target 95%) of Nokia’s employees completed the Ethical Business Training module.

3.2 In-depth training and guidance for on-site personnel

As a key component of our supply chain sustainability approach, we carefully track working conditions. We place a special emphasis on health and safety as part of our supply chain includes equipment installation and maintenance contractors who spend much of their time working at height or driving long distances.

A key control measure in enabling onsite work to be done safely is ensuring that everyone is authorized, has appropriate competence and is fit to work. This is supported by our health and safety control procedures, which address the supplier’s management capability on our initial engagement, and enables reviews of the procedures that they have in place when they start working on a project, monitoring compliance through on-site inspections. We have a mature and established global reporting and investigation process for incidents, which also includes the reporting and investigation of any suspected instances of child, forced, or bonded labor and other forms of modern slavery. For incidents related to child and forced labor Nokia also has a dedicated Child and Forced Labor Remediation process.

3.3 The risk of mistreatment of minorities and modern slavery

Modern slavery and forced labor remain a challenge for countries and supply chains. We have robust supplier audit and assessment processes and procedures in place. We continue to raise awareness of modern slavery through workshops and training with suppliers on the topic of good labor practices, ethical recruitment and inclusion and diversity. In 2024, we conducted training for our suppliers on Child Rights in the Supply Chain. Our work also includes advocating for greater dialog on the non-discrimination of

ethnic and other minorities.

3.4 Finding a solution to conflict minerals

A key area of our work with our supply chain is the ongoing identification of and mitigation of potential risks in the mining, extraction, and trade of metals that provide key minerals for electronic components. Risks include military conflict, human and labor rights violations, and damaging impacts to the environment. The traceability of our materials and ensuring our products are conflict-free is a priority, as reflected in our Responsible Minerals Policy¹⁰.

We aim to contribute to a long-term solution to the issue of conflict minerals that ensure responsible and conflict-free sourcing via legitimate trade, and bring sustainable improvements in the countries where the risks are greatest. We require that our suppliers commit to sourcing materials from environmentally and socially responsible sources. Materials that either directly or indirectly contribute to conflict are unacceptable.

As part of our work to ensure conflict-free minerals we collaborate with industry peers through the Responsible Minerals Initiative¹¹ and the Public-Private Alliance for Responsible Minerals Trade. Our due diligence approach is aligned with the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals.

We encourage suppliers to participate in the Responsible Minerals Assurance Process (RMAP) audit to underscore and validate their status as a conflict-free supplier. In 2024, we achieved a 65% validation level. A further 14% of smelters can reasonably be considered as conflict-free based on our due diligence efforts.

We have asked our suppliers to phase out those smelters that were not part of the industry assurance program, or which had not been evaluated as “low risk”. Engagement with such smelters over the recent years does not seem to have motivated them to collaborate, and therefore we can only assume this is because they are potentially engaging in non-compliant practices. The phase-out of such smelters is hence the only acceptable alternative for Nokia.

We also undertook due diligence for cobalt and mica in our components based on extended minerals material declarations for product parts. We engaged with 88 relevant suppliers about our requirements regarding cobalt and requested they exercise due diligence over the cobalt supply chain, with 32 suppliers also engaged in due diligence over mica. As a result, we identified 92 cobalt and 24 mica smelters in our cobalt supply

¹⁰ Nokia Responsible Minerals Policy

<https://www.nokia.com/sites/default/files/2023-11/nokia-responsible-minerals-policy.pdf>

¹¹ The Responsible Minerals Initiative <https://www.responsiblemineralsinitiative.org/>

chain, out of which 64% (cobalt) and 29% (mica) have gone through the Responsible Minerals Assurance Process (RMAP) and qualified for either “Conformant” or “Active” status. In 2024, we have also extended our awareness raising and due diligence on Cobalt and Aluminum in our supply chain.

For upstream engagement we continued our work with the Public-Private Alliance for Responsible Minerals Trade and contributed to the development of in-region programs.

3.5 Enhancement of procurement processes

We regularly evaluate the performance of our suppliers through multiple sustainability monitoring programs. Nokia’s key supplier-related monitoring, assessment and auditing activities include an on-site corporate responsibility audit program, EcoVadis sustainability assessments, Nokia’s in-house Supplier Health and Safety Maturity Assessment, the CDP Supply Chain Climate Change assessment and the Conflict Minerals Program - which all contribute to the sustainability pillar of our supplier performance evaluation. In our category strategies, we set performance requirements for suppliers to achieve or maintain “Preferred” and/or “Allowed” status across performance categories. Suppliers that do not meet performance requirements are downgraded.

4 Reporting concerns and speak-up culture

Nokia strives to be a company committed to combatting and avoiding all forms of retaliation and maintaining a culture in which its employees and partners feel comfortable raising concerns about suspected violations of Nokia’s Code of Conduct and policies, or applicable laws or regulations. Nokia will not tolerate any adverse treatment of an employee or partner (to the extent that it is reasonably within Nokia’s control for a non-employee) who raises a concern in good faith or provides evidence in support of such a concern.

We offer multiple channels for our internal and external stakeholders to report ethical concerns or suspected violations of the stated policies. The Nokia Ethics Helpline offers multiple options to report concerns, including an online portal that is available to the public, and a call center with numerous language options. These are operated by a third-party provider, Case IQ. Reports and conversations are confidential, and those reporting concerns may remain anonymous if they wish (subject to any local restrictions on anonymous reporting). Nokia also has internal and external web pages dedicated to concern-raising and whistleblowing resources. In 2024, a total of 930 concerns were raised through the Nokia Ethics Helpline reporting channels, of which 82 were related to working with third parties.

More information on grievances and the investigations carried out can be found on page 172 in our 2024 Annual Report.

Nokia Ethics Helpline information.

Email: ethics@nokia.com

Phone: <https://nokiaccms.i-sight.com/portal/dialing-instructions>

Website: <https://nokiaccms.i-sight.com/portal>

5 Audit results 2024

5.1 Increasing supply chain transparency

As a global company with operations around the world, we strive for increased transparency in all areas of sustainability reporting. In March 2025 we published our Annual Report for 2024 in which we reported the findings from our in-depth corporate responsibility supplier audits.

In 2024, our assessments identified two key areas of concern regarding child and young labor risk:

- **Incomplete Policies and Procedures for Apprentices:** Our review found gaps in policies and procedures related to the employment of apprentices. These gaps included a lack of due diligence for vocational schools and insufficient oversight of the learning programs for interns.
- **Student Workers Employed Through Contractors:** We also identified concerns regarding student workers hired and paid through contractors.

Additionally, we uncovered 23 findings related to forced labor.

- **Recruitment Fees:** Most of these findings (13) involved fees paid by workers during the recruitment process. These fees primarily covered pre-employment health examination fees but also included costs for transportation, lodging, and fees for passport renewals. These fees ranged from 1.5% to 68% of the worker's gross monthly salary. While most of these fees were reimbursed within the first months of employment, we maintain a zero-tolerance policy for such practices, and they must be discontinued.
- **Dispatch Worker Limits:** Five findings related to the percentage of dispatch workers employed exceeding the allowed limit of 10% or a lack of consultation with employee representatives.
- **Labor Contract Deficiencies:** Two findings involved labor contracts that lacked essential terms such as overtime provisions, contract dates, or benefits.
- **Passport Withholding:** One finding involved the withholding of employee passports until work permits were finalized.

Key areas of concern and the findings related to forced labor were addressed and closed during the first quarter of 2025.

Nokia continues to assess opportunities to improve its processes and supplier engagement efforts so that any potential lessons learned can be fully integrated into the future ways of working.

Tracking and follow-up

We continue to report against our long-term ESG targets, provide examples of corrective actions and KPIs in our 2024 Annual Report and follow-up on issues uncovered in supplier audits to check continued adherence. Suppliers failing to address audit findings within six months negatively affects their performance evaluation, as their audit score is lowered.

Supply chain workers are engaged through worker interviews during corporate responsibility audits to ensure their voice is included, and Nokia Ethical Helpline channels are open for all individuals and stakeholders, including our suppliers' employees, to flag concerns.

We disclose examples of our findings from our in-depth corporate responsibility supplier audits on page 157 of our 2024 Annual Report.

6 Collaboration and looking forward

In 2024, we continued our collaboration with several key organizations that focus on corporate responsibility in global supply chains. As a member of the RBA, we participated in workstreams covering labor rights and environmental issues.

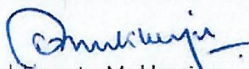
We also continued our collaboration with the JAC, an association of telecommunications operators (our customers) that aims to verify, assess, and develop corporate responsibility implementation across the manufacturing centers of multinational suppliers in the ICT sector. The membership of JAC increased in 2024 and now includes 29 of the world's largest telecom operators. JAC members share resources and best practices to develop long-term sustainability and corporate responsibility implementation in the different layers or tiers of the global ICT supply chain. In 2024, we conducted 101 supplier corporate responsibility audits, the majority of which were conducted through either the RBA Validated Assessment Program (VAP) audits or the JAC framework.

As part of our commitment to respecting human rights, we continue to be an active member of the multi-stakeholder Global Network Initiative (GNI), which examines human rights in the ICT sector and involves leading companies, investors, academics, and civil society groups. Participating companies are independently assessed every two to three years on their GNI commitments. This independent assessment is carried out by a GNI-accredited external assessor. Nokia was the first telecommunications equipment vendor

to successfully complete a GNI assessment in 2019. We successfully completed our second independent assessment for the GNI, with the public report made available in 2023. Nokia's next assessment is in 2026.

We aim to keep our robust systems, processes, and procedures at the current high standard, while seeking to continually improve our ways of working, and driving for increased vigilance. We will also continue to drive dialog on modern slavery and human rights in the supply chain, and encourage our main suppliers to recognize and act on the challenges of modern slavery.

This statement covers the financial year of 2024.



Subhagata Mukherjee

Vice President & Global Head of Sustainability

Nokia Group

7 Attestation and other legal mentions

This Statement applies to Nokia Corporation and its subsidiaries and has been prepared and is intended to meet Nokia's reporting obligations under various acts in several jurisdictions, as listed below.

Australia

Under the Modern Slavery Act 2018 (Cth) and NSW Modern Slavery Act 2018 (NSW Act), the reporting entity for the purposes of this Statement in Australia is Nokia Solutions and Networks Australia Pty Limited. This Australian entity is a fully integrated entity within the Nokia global group and aligns with all Nokia's global policies and practices.

During the preparation stage of this Statement, a representative of the Board of Directors of Nokia Solutions and Networks Australia Pty Limited was consulted and given the opportunity to input and ensure that the modern slavery risks relating to NSN Australia (if any) were appropriately identified, assessed, and addressed. NSN Australia's board and senior management are aware of the content of this global Statement and are aligned with its contents.

California

This statement is intended to meet Nokia's reporting obligations under the California Transparency in Supply Chains Act 2010.

Canada

This statement is intended to meet Nokia's reporting obligation under the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. Nokia provides this statement on behalf of Nokia Solutions and Networks Oy and Nokia Canada Inc. For the purpose of, and in accordance with, the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, Nokia Canada Inc. and Nokia Solutions and Networks Oy are considered an 'entity' under the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act and make this statement as a single statement pursuant to section 11. For the purpose of the relevant approval and signing requirements, this modern slavery statement has been approved by the governing body of Nokia Solutions and Networks Oy and has been signed by a director. Nokia Canada Inc.'s board and senior management are aware of the content of this global Statement and are aligned with its contents.

United Kingdom

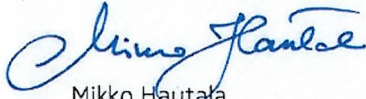
The following Nokia affiliates must report for the purposes of the United Kingdom's Modern Slavery Act of 2015: Nokia UK Limited; Nokia Solutions and Networks Oy and Alcatel Submarine Networks UK Limited.

United States

The following Nokia affiliate must report for the purposes of participating in the US Customs and Border Protection CTPAT Trade Compliance program: Nokia of America Corporation.

Nokia and its subsidiaries share the same core business operations and supply chains, policies prohibiting modern slavery, and supporting processes described above in this statement. The above statement covers Nokia's fiscal year ended December 31, 2024 ("FY2024").

The Board of Directors of Nokia Solutions and Networks Oy, for itself and the Nokia affiliates listed in this note approved this Statement on 30th of May.



Mikko Hautala

Chairman

Nokia Solutions and Networks Oy

Nokia is a registered trademark of Nokia Corporation. Other product and company names mentioned herein may be trademarks or trade names of their respective owners.

This Modern Slavery Statement 2024 was approved by the principal governing body (being the Board of Directors) for the reporting entity (being Nokia Solutions and Networks Australia Pty Ltd) via circular resolution of the Directors dated 23 June 2025.



Andrew Cope

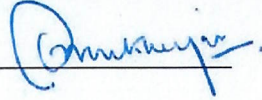
Director, Nokia Solutions and Networks Australia Pty Ltd

Attestation for purposes of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act

In accordance with the requirements of the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("the Act"), and in particular section 11 thereof, I, in the capacity of Vice President Sustainability, attest that I have reviewed the information contained in the report titled "Modern Slavery Statement 2024" issued on behalf of the governing body of Nokia Solutions and Networks Oy and Nokia Canada Inc. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.

I have the authority to bind Nokia Solutions and Networks Oy and Nokia Canada Inc.,

Date: 30.05.2025

Signature: 

Subhagata Mukherjee
Vice President & Global Head of Sustainability
Nokia Group